

# **EXHIBIT G**

Page 1

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEW JERSEY  
3 CAMDEN VICINAGE  
4 MDL No. 2875

5 -----x  
6 IN RE:

7 VALSARTAN, LOSARTAN and IRBESARTAN  
8 PRODUCTS  
9 LIABILITY LITIGATION

10 -----x

11 August 13, 2021  
12 9:12 a.m.

13 14 15 16 17 VIDEOTAPED DEPOSITION of STEPHEN  
18 LAGANA, MD, held at the offices of  
19 Greenberg Traurig LLP, located at 445  
20 Hamilton Avenue, 9th Floor, White Plains,  
21 New York 10601, before Anthony Giarro, a  
22 Registered Professional Reporter, a  
23 Certified Realtime Reporter and a Notary  
24 Public of the State of New York.  
25

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1 A It's the DNA damage that  
2 makes it carcinogenic.

3 Q Well, it still has to be  
4 metabolized, doesn't it?

5 A Yes. And then it causes DNA  
6 damage.

7 Q On the universal carcinogen,  
8 are you asking me to re-ask the question?

9 A Yes.

10 Q Is there any carcinogen that  
11 equally can cause all types of cancer?

12 A That's a concept I haven't  
13 considered before. So there's a concept  
14 in medicine called the multi-specificity,  
15 which I think would apply to this  
16 discussion, whereas if we say something  
17 is specific, that seems to exclude other  
18 avenues.

19 But take, for example, like  
20 cigarette smoking, it is a multi-specific  
21 carcinogenic. It can cause lung cancer.  
22 Obviously, it can cause head and neck  
23 cancers. It can cause bladder cancer.  
24 So it's multi-specific. And there are a  
25 lot of multi-specific carcinogens,

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1 6:48 Eastern Time. This concludes  
2 the testimony of Dr. Stephen Lagana.

3 (Time noted: 6:48 p.m.)

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DR. STEPHEN LAGANA

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8 Subscribed and sworn to  
9 before me on this \_\_\_\_\_ day  
10 of \_\_\_\_\_, 2021.  
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NOTARY PUBLIC